

Behavioural safety

a guide for members



Introduction

Some employers are trying to change the way we look at health and safety. They want the focus to shift away from what managers should be doing to manage health and safety in the workplace, towards finding reasons to blame employees when something goes wrong. UNISON is very clear that this approach is not good health and safety management.

Good health and safety management means checking for things that could cause harm at work, and either removing them or making them less dangerous. Behavioural safety is just one way in which employers may try to shirk these responsibilities.

What the law says

By law, employers must identify and remove or avoid hazards which may harm their employees. So for example, if a box is a trip hazard, it should be removed.

Where it is not reasonably practicable to avoid or remove a hazard, then the employer must take steps to minimise the chance of someone being harmed as far as is reasonably practicable. This applies to all hazards including stress, but how it is done depends on the circumstances.

“Reasonably practicable” means that the more likely it is that harm will occur - and the more serious that harm could be - the more an employer is expected to do to avoid or minimise the danger.

Employers should make these decisions through a process called risk assessment. UNISON has produced information on risk assessments for members and a guide for safety reps which explains risk assessment in more detail, see below for details.

Behavioural safety

What does it mean?

Behavioural safety programmes (bhav) have become popular with some employers. They can also be called behavioural modification, behaviour based safety or something similar.

These programmes try to claim that workplace injuries are the result of “unsafe acts” by workers and so their focus is on changing staff behaviour to supposedly improve health and safety. In its purest form behavioural safety could lead to an employer claiming that if, for example, a member of staff trips over a box on the floor it is their fault because they didn’t notice it and avoid it.

What does UNISON think?

UNISON believes that this approach is wrong. Major incidents still occur and re-occur because of the poor management of health and safety and some of the biggest supporters and sellers of bhav have suffered major disasters and deaths.

Cost cutting, outdated and broken equipment and BP’s ignoring of warning signs and near-misses led to the Texas City refinery explosion which killed 15 people in 2005.

DuPont is a major international company that sells its “STOP” behavioural system, but Carl Fish a DuPont employee, died in 2010, after being sprayed with a dangerous chemical. DuPont had considered replacing the unsuitable, broken, old pipes 20-30 years earlier but decided to save money by not doing so. Following four deaths in 2014, the safety inspectorate found intentional, repeat, and serious breaches at a DuPont chemical plant in La Porte, Texas.

Five things wrong with bhav programmes

1. Bhav programmes don’t remove the hazard, and ignore risks and the real causes.

These programmes ask why Daisy didn’t look out for the cables she tripped over, rather than asking why the cables were left as a trip hazard and not removed. Or if Raj got an eye injury while not wearing safety glasses, was it his fault? Or was it his employers because when the cheap glasses got so scratched Raj and his colleagues couldn’t see out of them and the employer didn’t replace them?

2. Bhav programmes miss what actually happens at work and do not adequately consider human error.

Bhav programmes are based on observations but we tend to act differently when observed. Some health and safety failures are

difficult to observe such as a misused permit to work system. Some consequences are so rare that they will go unnoticed until a catastrophe occurs such as with a gas or chemical leak. Instead, lots of attention may be given to more frequent, less serious, but easily observable hazards – that's not a good system!

It's also not enough just to blame workers even where there has been a genuine error. People do get tired and distracted and may misunderstand or make mistakes. So equipment, systems, and procedures must take these human characteristics into account. For example, it can and should be impossible to wrongly connect different pieces of equipment where the consequence might be catastrophic. Work can be designed to keep us stimulated. Rest breaks can protect us from fatigue.

3. Bhav programmes tend to blame workers but ignore the behaviour and decisions of management.

By focusing on the actions of the worker involved in an incident, with a back injury for example, bhav just looks for what they could have done differently. Other measures such as removing the hazard or looking for the real causes (see point 1 above) are not considered.

The focus on workers also means that the actions of managers and supervisors are ignored. But their decisions on shift patterns and staffing levels, resources and budgets, and whether to replace equipment etc can all have important impacts on health and safety.

4. Bhav programmes usually ignore ill health and don't necessarily improve injury rates.

Bhav programmes tend to focus on safety incidents which are easy to identify compared with work related ill health - which can take many years to develop and is harder to link to a cause. However, safety incidents are just the tip of the iceberg so this is a big mistake! The TUC says that the government's own figures show that around 20,000 people die each year from work related causes, but almost 19,000 of these are from ill health. The National Hazards Campaign believes that the government's

figures are a huge underestimate, arguing that the true figures are closer to 50,000.

In addition, injury rates might not fall as a result of a bhav intervention. Any initial success may just be due to the huge amount of time and resources put in when a project is new. Or worse still, may just be down to fewer people reporting injuries. The fear of being blamed or punished, or the potential loss of rewards such as bonuses, prizes, or competition entries, can encourage employees not to report an incident.

5. Bhav programmes may not meet the requirements of the law and may undermine trade union safety reps.

By focusing on workers' behaviour, employers can end up ignoring what the law requires, which is to reduce the chance of their staff being harmed and to not expose them to hazards.

And while union safety reps improve workplace health and safety, bhav can undermine them in a number of ways such as:

- being placed outside of the joint health and safety committee
- discouraging reports
- pitting employees against one another when looking to blame someone for the loss of bonuses or prizes.

So should we not try to change behaviour?

No! People should take care and it is important to encourage safe work. This is why the law requires workers to be given information, instruction, training, and supervision; but it is wrong to believe that just telling people to take more care is sufficient.

The Health and Safety Executive (HSE) is the key authority for "policing" health and safety in the UK. It believes that human factors can be considered by employers to recognise that we are not machines. So work methods and systems must be designed to suit us. If it is possible to make a mistake, be distracted, or misinterpret,

then this possibility or its consequence should be removed by good design of the process or equipment.

The HSE also states that the greatest influence on behaviour is organisational factors, so organisations must promote employee involvement beyond the legal minimum and at all levels. This should cover the decisions, behaviour and actions of management as well.

What next?

If you have a concern about bhav, speak to your UNISON safety rep. UNISON has produced a guide for safety reps with checklists and advice on what to do and look for if an employer proposes to introduce bhav. Behavioural Safety – A new workplace hazard to risk assess? – UNISON guide for safety reps (stock number 3603) can be downloaded or ordered from unison.org.uk/catalogue. Other guidance on particular hazards is also available from the online catalogue or from unison.org.uk/safety.

Work with us

Workplace health and safety is far better in workplaces where employers consult with trade union safety reps. Our members and reps have lots of experience and knowledge about what works well and what doesn't. Employers must legally consult with UNISON safety reps and, through them, UNISON members.

Whether it is bhav initiatives, or something else affecting employees' health and safety, make sure your UNISON branch is consulted. Speak to your safety rep if you have any concerns about these or any other health and safety issues.

When it comes to health and safety, UNISON's message to employers is: "Don't harm us, don't blame us, work with us!"

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where health
and safety
matters**



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